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ND-2009-9-C

219664

October 14, 2009

**Via Overnight Mail**

Mr. Charles L.A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
101 Executive Center Drive, Suite No. 100  
Columbia, South Carolina 29210

2009 OCT 15 10 31 AM  
FBI

**Re: Petition of Palmetto Rural Telephone Cooperative for  
Commission Approval for Extraordinary Retirement Pursuant to  
Section 32.2000(g)(4) and (g)(5)**

Dear Mr. Terreni:

On behalf of Palmetto Rural Telephone Cooperative, John Staurulakis, Inc. ("JSI") respectfully submits the attached data request responses in the matter described in the above heading to Albert Lewis, Division Chief, Pricing Policy Division. This filing is being provided to the South Carolina Public Service Commission and the South Carolina Office of Regulatory Services for informational purposes.

Please direct any inquiries or requests regarding the petition to Kenneth Cartmell ([kcartmell@jsitel.com](mailto:kcartmell@jsitel.com)).

Sincerely,

A handwritten signature in black ink that reads 'Kenneth T. Cartmell'.

Kenneth T. Cartmell  
Senior Consultant-Regulatory

KTC/mk  
Attachment

cc: C. Dukes Scott, South Carolina Office of Regulatory Staff  
Jason J. Dandridge, Palmetto Rural Telephone Cooperative

Echelon Building II, Suite 200  
9430 Research Blvd.  
Austin, Texas 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve  
Eagan, Minnesota 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Building B-3, Suite 200  
Atlanta, Georgia 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
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October 14, 2009

**Via Overnight Mail**

C. Dukes Scott  
Executive Director  
South Carolina Office of Regulatory Staff  
1441 Main Street, Suite No. 300  
Columbia, South Carolina 29201-2849

**Re: Petition of Palmetto Rural Telephone Cooperative for  
Commission Approval for Extraordinary Retirement Pursuant to  
Section 32.2000(g)(4) and (g)(5)**

Dear Mr. Scott:

On behalf of Palmetto Rural Telephone Cooperative, John Staurulakis, Inc. ("JSI") respectfully submits the attached data request response in the matter described in the above heading to Albert Lewis, Division Chief, Pricing Policy Division. This filing is being provided to the South Carolina Public Service Commission and the South Carolina Office of Regulatory Services for informational purposes.

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Kenneth T. Cartmell  
Senior Consultant-Regulatory

KTC/mk  
Attachment

cc: Charles L. A. Terreni, South Carolina Public Service Commission  
Jason J. Dandridge, Palmetto Rural Telephone Cooperative

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October 14, 2009

Albert M. Lewis  
Chief  
Federal Communications Commission  
Pricing Policy Division  
Wireline Competition Bureau  
445 12th Street SW  
Washington, DC 20554

**Palmetto Rural Telephone Cooperative Petition for Extraordinary Retirement  
Pursuant to Section 32.2000(g)(4) and (g)(5)**

On September 9, 2009, Palmetto Rural Telephone Cooperative ("Palmetto") submitted its request to the Federal Communications Commission ("FCC" or "Commission") for approval pursuant to Section 32.2000(g)(4)<sup>1</sup> of the Commission's rules to make the necessary journal entries to complete, effective January 1, 2009 an extraordinary retirement of the central office Nortel DMS 100 switch.

On September 24, 2009, Mr. Dewaine J. Wilson from Palmetto, along with Mr. Kenneth T. Cartmell and Ms. Bhavini S. Sohkey from John Staurulakis, Inc. discussed this matter with FCC Staff members Mr. Daniel Ball, Ms. Sherry Herauf, and Mr. John Hunter. This telephone conversation resulted in a list of seventeen (17) questions posed by FCC Staff regarding Palmetto's request for extraordinary retirement treatment, which was forwarded to Palmetto via email, on September 25, 2009. Attached you will find the responses to those questions.

Please review this information at your earliest convenience, and let me know if you have additional questions, or if you require more information.

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<sup>1</sup> 47 C.F.R. § 32.2000(g)(4).

**Albert M. Lewis**  
**Page 2**

Sincerely,

A handwritten signature in black ink, reading "Kenneth T. Cartmell". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Kenneth T. Cartmell

KTC/tms  
Enclosure

cc: Daniel Ball, FCC Staff  
Sherry Herauf, FCC Staff  
John Hunter, FCC Staff  
Jason Dandridge, Palmetto Rural Telephone Cooperative  
Dewaine Wilson, Palmetto Rural Telephone Cooperative  
South Carolina Public Service Commission  
South Carolina Office of Regulatory Staff